

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF NEW HAMPSHIRE

LAURIE ORTOLANO

VS NO: 22-CV-00326-LM

THE CITY OF NASHUA, Et Al.

DEPOSITION OF LAURIE ORTOLANO

This deposition taken by agreement of counsel
at the Law Offices of Cullen, Collimore & Shirley,
37 Technology Way, Suite 3W2, Nashua, New
Hampshire, on May 8, 2024, commencing at 10:20 a.m.

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1 A No, actually, I worked a couple years when he
2 was born. When he was an infant, I was still
3 working.
4 Q I think I asked you this, but subsequent to
5 DARPA, you haven't had any other private
6 employment?
7 A No.
8 Q Or public employment?
9 A I was an elected official in Litchfield, but
10 that was small pay.
11 Q What was your position there in Litchfield?
12 A I was elected to the school board and I served
13 about five years, and then I was elected to
14 the budget committee, and I served two to
15 three years.
16 Q Other than your litigation with the City of
17 Nashua, have you been in litigation of any
18 type with any other entity?
19 A No, I had this one issue with a gym in 2014
20 where they charged my credit card for a
21 membership. They continued to charge my card,
22 and I called the attorney general's office,
23 and they took the case, and that settled out.

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1 that a number you agree with, it is about 16?
2 A Yes.
3 Q When did the City put it up on a graph?
4 A At the March 26 meeting, they held a public
5 meeting on outside legal costs, and they did a
6 presentation on how much money I have cost the
7 City.
8 Q Was that a board of aldermen meeting?
9 A Yes, a special board of aldermen meeting.
10 Q When did you move to Nashua?
11 A I'm not sure. It would have been --
12 essentially 2014. Last week of December '13,
13 I think we moved in. So winter of 2014, we
14 were firmly planted.
15 Q Were either of your kids still in public
16 school at the time?
17 A My oldest was in college, and my youngest was
18 a sophomore -- No, when I moved to Nashua, I
19 would say he was a junior. No, maybe a
20 sophomore, somewhere around there, sophomore
21 in high school. I think he was a freshman
22 actually. I am sorry, I think it was a
23 freshman in high school.

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1 So that was like my one issue, my first time
2 having a litigation. I don't even know if I
3 would call it litigation. It was very
4 short-lived.
5 Q Now, you have, obviously in addition to this
6 suit, you had some 91A lawsuits pending
7 against the City now?
8 A Yes.
9 Q How many are currently pending?
10 A I think there are four or five. I just
11 dropped one to essentially -- there are two
12 cases that were very similar. So I am running
13 with a second case. I am going to say four or
14 five.
15 Q When was the last time you filed a
16 Right-To-Know suit against the City?
17 A Probably three months ago.
18 Q And I think I read in one of your affidavits
19 that you may have filed about 16 in total
20 against the City, is that right?
21 A That is what the City put up on the graph,
22 yes, about 16 files.
23 Q When you say the City put up on the graph, was

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1 Q Your youngest son was in high school at the
2 time you moved here?
3 A Yes.
4 Q That is as specific as I need.
5 A Okay.
6 Q When you came here, did you join any or seek
7 to join any boards?
8 A No.
9 Q Have you since in Nashua?
10 A Yes.
11 Q Have you been on any boards here?
12 A No, I didn't get appointed.
13 Q Which boards did you seek to get appointments
14 to?
15 A The board of assessor's had openings, when it
16 had an opening, two openings, when I started
17 doing assessing work in 2018, so I applied,
18 but I didn't receive a comment or response
19 back. I applied again in 2019, and I think I
20 received a response that I wasn't a candidate
21 they were looking for.
22 And then I applied to the assessing
23 standards board in -- I think that was 2019

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1 -- maybe 2020, and the board itself has two or
 2 three public people, and a gentleman who was
 3 on it recommended that I take his seat. So he
 4 wrote a referral to the governor, and the
 5 governor made the recommendation to the
 6 executive council, and I wasn't -- they didn't
 7 do a vote because the governor knew before the
 8 vote that I wasn't supported on a three-two
 9 vote, so I didn't get that seat. And I ran
 10 for public works in November of 2021, and I
 11 lost that seat. That was an actual election.

12 Q The assessing standards board, that was a
 13 state board?

14 A Yes.

15 Q You said you started doing assessing work in
 16 2018.

17 When you say you started doing
 18 assessing work, what do you mean?

19 A The new assessments had come out from KRT, the
 20 company hired to do an update in late August,
 21 and when I received our new number, I was
 22 concerned, and I went to the assessing office
 23 and had a conversation, and that started my

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1 did give assistance, and I published some
 2 things on GoodGov, where I told people to look
 3 up data. If you are concerned, go look this
 4 up.

5 I made a series of videos on GoodGov
 6 on how to file an abatement, how to do it
 7 yourself, and frankly, the City, I don't
 8 think, was very happy about it, and I was
 9 pretty squashed in the whole thing, so I never
 10 did it again. I had people seek me out last
 11 year, and I just didn't do it anymore.

12 Q When you say you think the City wasn't very
 13 happy about it, what specifically made you
 14 feel the City wasn't very happy about it?

15 A When I tried to assist two senior citizens,
 16 and sent the abatements in to be date/time
 17 stamped, they sat on them for almost 20 days
 18 which is unheard of. That neighborhood had a
 19 street of 8 properties to be reevaluated and
 20 the City policy, policy practice or guideline
 21 was if there is a cluster of houses that are
 22 incorrect, they correct those first because
 23 they can deal with a pile of them.

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1 work into trying to get our property
 2 assessment corrected.

3 Q So that is your first foray into what you call
 4 assessing work?

5 A I actually did call in 2014 when we moved in,
 6 and I saw our assessment jump 5 grand. Our
 7 tax bill went up \$5,000. I made my first
 8 contact with the tax assessor then.

9 And then I made contact again with
 10 the assessing chief in 2017, very concerned
 11 when my tax bill cost 18,000, and I thought it
 12 was way too high.

13 I had minimal contact at those two
 14 points.

15 Q I understand you also assist other people with
 16 their assessing challenges, should we say?

17 A Not really. I would say the year after KRT
 18 people did seek me out to help them with
 19 their -- it wasn't KRT. It was when Vision
 20 came out with the new numbers. They asked me
 21 to help them out in 2021. I got calls from
 22 neighborhoods, and letters saying, we seek
 23 your assistance, come to our street, and so I

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1 There was a cluster of houses in
 2 that neighborhood at that time in 2021, they
 3 ended up dealing with them last. They went to
 4 the bottom of the pile.

5 People who went before the board who
 6 carried their own assessments in, asked me for
 7 help. There were only two I represented.
 8 Everyone else went on their own, said to me
 9 when they went before the board of assessor's,
 10 they were questioned, oh, did somebody help
 11 you, don't even say her name, we know who she
 12 is. They seemed to be just not happy with the
 13 work of what was submitted.

14 Q Sorry. To pin this down a little more, when
 15 you say they, who didn't seem happy?
 16 Specifically, who are you talking about?

17 A Kim Kleiner, I will say Ms. Kleiner. She was
 18 running the assessing office at that time, and
 19 I don't believe there was a chief at that
 20 time.

21 Q Was it your impression that Ms. Kleiner had
 22 direct contact with these applicants?

23 A I think a lot of them screened through the

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1 office and in fact --

2 Q Is that a no, I am not sure I understand.

3 A I am going to say yes, she probably did,

4 because the assessing office was closed that

5 year for construction, and all the

6 applications were going through her office

7 because several of the assessing staff members

8 moved into her office to do work. There was

9 no assessing office open at that time.

10 Q So based on -- it is based on the overall

11 geography of the department that you believe

12 Kim Kleiner was directly involved?

13 A Yes, and you know what, I am going to take

14 back that an assessor wasn't assigned. That

15 month, December, they brought in Rick Vincent

16 as a consultant, so he came on board. So Rick

17 Vincent was also involved. He was a chief in

18 Lebanon, and he retired and came to Nashua.

19 Q To give me a time frame again, you said

20 December.

21 December, what month?

22 A 2020.

23 Q I want to go back now, because I did take this

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1 Colquhoun?

2 A Colquhoun, yes.

3 Q It indicates they met you on June 25th, 2019.

4 Is that about the recollection you

5 have of when you guys met?

6 A Yes.

7 Q In the middle of the first page, it references

8 18 different documents that it references.

9 These references come from binders, black and

10 a blue binder of information you had compiled.

11 Where did you compile that

12 information?

13 A From city hall. Those were city hall records.

14 Q And were they records that you got through the

15 Right-To-Know requests?

16 A Yes.

17 Q There is a document 2 here, Attorney Robert

18 Fojo's letter to Mayor Donchess, dated 8th of

19 May, 2019.

20 Was that a letter that he wrote on

21 your behalf?

22 A Yes.

23 Q When did you first hire Attorney Fojo to

Page 23

1 in sequence and talked a little bit about the

2 investigation that was done by the Nashua

3 Police Department into the assessing

4 department.

5 When this, I am going to show you a

6 document, and we will mark it as Exhibit 1.

7 Mike, for your sake, I am looking at the

8 police report of John Lehto, dated June 25th,

9 2019.

10 (Whereupon, the court reporter

11 marked Exhibit Number 1, Police Report

12 6-25-2019, for Identification.)

13 Q Ms. Ortolano, with respect to this document

14 and anything else that I give you, take as

15 much as time as you want to look at it, but I

16 will have some specific questions that I will

17 want to highlight for you.

18 A Good. Thank you.

19 Q With respect to this first one, my first

20 question is fairly simple, this is a report by

21 Captain Lehto at the time, and it references a

22 meeting with Lieutenant Mederos, and you and

23 Laura, and I am going to butcher her name,

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1 represent you?

2 A It was in 2018, late, maybe November of 2018.

3 Q And without going into detail what you said to

4 each other, what was the purpose of you hiring

5 him?

6 A To help me write a Right-To-Know. It was the

7 first time I was writing an official

8 Right-To-Know, and I couldn't remember how to

9 do it properly. So I asked him to help me.

10 Q And then there is a second letter reference

11 from the same attorney on item 4, his letter

12 to Attorney Broth dated 7 June, 2019.

13 Do you see that?

14 A Yes.

15 Q And was he still representing you then in June

16 of 2019?

17 A Yes.

18 Q And for how long did Attorney Fojo to

19 represent you?

20 A I think until maybe October of 2019.

21 Q And was there any particular reason that

22 relationship ended?

23 A I wasn't getting where I thought I should be

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1 on my abatement, which was now an appeal.
 2 Q I know you also were represented by Rick
 3 Lehmann at some point?
 4 A Yes.
 5 Q Did you go directly from Attorney Fojo to
 6 Attorney Lehmann?
 7 A More or less. He first assisted Cheryl
 8 Walley, a lady in the assessing office on a
 9 settlement agreement. He worked with her, and
 10 then I would say in January of 2020, he began
 11 working on my issues.
 12 Q Back in 2019, were you friendly with Cheryl
 13 Walley?
 14 A Yes.
 15 Q And I take it, it was her recommendation that
 16 led you to Attorney Lehmann?
 17 A No. No.
 18 Q How did that come about?
 19 A It was an article in The Telegraph about him
 20 helping a school board member in Nashua,
 21 George Farrington, and so I called him cold.
 22 Q And again, without going into details of your
 23 conversations with him, what was the topic

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1 that you were asking Attorney Lehmann to
 2 assist you with?
 3 A Right-To-Know issues.
 4 Q And for approximately how long did Attorney
 5 Lehmann represent you?
 6 A He was on, let's see -- he was on until I am
 7 going to say October of 2021.
 8 Q So from approximately January 2020 to 2021, he
 9 was engaged with you in some manner?
 10 A Yes.
 11 Q And when you reached out to him originally
 12 after reading the George Farrington article,
 13 do you remember when that was?
 14 A You know what, it was September of 2019
 15 because I reached out to him because of the
 16 police coming to my door in 2019 and issuing
 17 me a warning. I was scared.
 18 Q Let's go to that then.
 19 The police came to your door --
 20 A September 22nd of 2019? It was A Sunday
 21 afternoon.
 22 Q Were you home at the time?
 23 A I was at Laura Colquhoun's home. My husband

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1 was home.
 2 Q I take it your husband notified you that they
 3 had been there?
 4 A Yes.
 5 Q And is that when you reached out to Attorney
 6 Lehmann then?
 7 A Yes.
 8 Q Did you reach out to him before you went down
 9 to the station?
 10 A No.
 11 Q How soon after you went to the station did you
 12 reach out to Attorney Lehmann?
 13 A I am going to say two or three weeks?
 14 Q When did you first learn that Detective
 15 Lombardi had been assigned to investigate the
 16 allegations that you made about the assessing
 17 department?
 18 A I don't recall, because he wasn't in the
 19 interview in June, involved initially, and I
 20 wasn't getting reports. So I don't really
 21 know when he -- my recollection would be in
 22 September when he was there with his other
 23 police officer, Heron, Haran (phonetic) or

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1 whatever his name was. I might have said
 2 something to him, but I just don't recall when
 3 I knew he was involved.
 4 Q Had you had any prior contact with Lombardi
 5 before the assessing department case?
 6 A Not that I know of.
 7 Q Any since that case was over?
 8 A No.
 9 Q Just to close the loop on that then, other
 10 than your interaction with Detective Lombardi
 11 with respect to the assessing department
 12 investigation and this warning to you, did you
 13 have any other interaction with him at all?
 14 A I can't recall him being involved. I don't
 15 believe he was involved in the arrest. If I
 16 did Right-To-Knows, it went through David
 17 Lavoie, through the police department, and
 18 what I found is the officers move around a
 19 lot. They get promotions and their titles
 20 change, and they seem not to be in the same
 21 place for very long. So I don't know where he
 22 went.
 23 Q When you talk about the graphs, you mean the

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1 Q With respect to the concern that she expressed
 2 to you about Ms. Kleiner conveying the story
 3 that made her feel like it was some sort of a
 4 threat to her, would you agree that is not the
 5 way she conveyed it to Detective Lombardi?
 6 A I would agree with you on that.
 7 Q One of the documents in the list here, number
 8 5 is a Freyler investigative report.
 9 Mr. Freyler was a private
 10 investigator you had hired?
 11 A Yes.
 12 Q What was the purpose of hiring him?
 13 A I was concerned that Mr. Turgiss was not
 14 maintaining the property files properly and
 15 leaving the office for roughly four hours a
 16 day, signing on a white board saying he was
 17 going to inspect properties but then really
 18 wasn't doing that work.
 19 Q And as part of his work for you, is it fair to
 20 say Mr. Freyler followed Mr. Turgiss around?
 21 A Yes.
 22 Q Was that something -- was that your idea or
 23 was that Mr. Freyler's idea?

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1 Q Sure, and on the days when it fit his
 2 schedule, did he watch Mr. Turgiss for the
 3 whole day, basically start to finish?
 4 A He would watch him until -- he initially would
 5 watch him leaving city hall, and then attempt
 6 to follow him, and then going back to city
 7 hall, but he had difficulty following him. He
 8 would lose him, Mr. Turgiss would lose him
 9 frequently. He was an investigator. He was
 10 having trouble.
 11 Q His intent, anyway, was to essentially follow
 12 him for all the time he was outside of the
 13 office?
 14 A Yes.
 15 Q Obviously, on the days that he was working?
 16 A Yes.
 17 Q And that would include checking out what he
 18 was doing at lunchtime?
 19 A Yes, but it seems to me he didn't do a lot of
 20 lunchtime. He just went to a place and stayed
 21 at a place.
 22 Q Did Mr. Freyler videotape Mr. Turgiss?
 23 A I don't know if he videotaped. He took

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1 A He was an investigator. That was really his
 2 idea as to how he conducts and investigation.
 3 Q I take it he billed you by the hour?
 4 A I believe so.
 5 Q And so did he submit to you reports that
 6 indicated which hours he worked on different
 7 days?
 8 A Yes.
 9 Q How many hours a day was he following
 10 Mr. Turgiss around?
 11 A He would focus on coming when we knew he was
 12 signing out. So he had a pattern, this
 13 assessor. So he would work according to that
 14 pattern, and he would come, you know, three or
 15 four days a week, if he had another
 16 commitment, because he had other jobs.
 17 Q He being -- I am sorry to interrupt,
 18 Mr. Freyler?
 19 A Will Freyler would say I can't be there on
 20 Tuesday or can't be there on Friday. I have a
 21 commitment, but I will come down and do
 22 Monday, Wednesday and Thursday and monitor.
 23 He picked it on his schedule.

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1 photos.
 2 Q Kind of classic PI work, sitting in his car
 3 taking pictures out the window of Mr. Turgiss?
 4 A Yes.
 5 Q Did Mr. Turgiss, to your knowledge, did
 6 Mr. Turgiss learn about Mr. Freyler's
 7 activities?
 8 A No, I don't believe so.
 9 Q Other than the police, who else was the
 10 Freyler investigation report turned over to?
 11 A The City.
 12 Q And who at the City?
 13 A It went to the Mayor, and I believe Attorney
 14 Bolton, and it was a letter to from Attorney
 15 Fojo, item 2, from Fojo's letter to Mayor
 16 Donchess was that investigative report.
 17 Q Thank you. So Attorney Fojo provided the
 18 report on your behalf to the Mayor?
 19 A Yes.
 20 Q Did you ever meet with Attorney Broth?
 21 A Yes. That resulted in number 4. I believe
 22 that came after a meeting with myself and
 23 Attorney Fojo.

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- 1 Q Where did that take place?
- 2 A It took place in the area between the parking
- 3 garage on Elm Street that a lot of city
- 4 employees park in and city hall behind it.
- 5 There is a walking path that goes into a back
- 6 entrance to city hall, and the employees would
- 7 use that a lot, and she was in that back area
- 8 in I think a public street area, not on city
- 9 hall grounds and not on anyone's property. It
- 10 is right behind the Sy Mahfuz' Persian Rug
- 11 Gallery. That is where we were.
- 12 Q The one with the nice big mural?
- 13 A Nice big --
- 14 Q -- mural on the side?
- 15 A Yes.
- 16 Q That side entrance to city hall, you said the
- 17 employees use it, that is not a public
- 18 entrance, right?
- 19 A It is. I actually started using it when the
- 20 assessing ladies told me go out that way, it
- 21 is quicker. It is public.
- 22 Q So you can go in and out that door?
- 23 A It is. I never really used it.

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- 1 Q And then you went to city hall, went to the
- 2 assessing department to ask for a copy of that
- 3 note?
- 4 A Yes.
- 5 Q Did Cheryl Walley ask you to get it for her?
- 6 A She definitely wanted it. She thought when
- 7 they packed her office up, they wouldn't give
- 8 it to her.
- 9 Q My question was, did she actually ask you to
- 10 get it for her?
- 11 A No.
- 12 Q You also wanted it, right?
- 13 A Yes.
- 14 Q You went in that morning to pick it up?
- 15 A Yes, I think it was lunchtime, whatever break
- 16 time, I knew it was lunchtime because it
- 17 turned out Lynn Cameron wasn't in.
- 18 Q Why did you want to ask Lynn Cameron for it as
- 19 opposed to Louise Brown or someone else?
- 20 A Louise Brown was not helpful to me. She was
- 21 not somebody who wanted to assist me. Lynn
- 22 Cameron was very helpful and friendly to me,
- 23 and she was a good friend of Cheryl Walley,

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- 1 Q Had you been at the assessing office earlier
- 2 that day?
- 3 A I did.
- 4 Q Do you remember what you were there to do?
- 5 A I was. I was there to get a piece of paper on
- 6 Cheryl Walley's wall. She had been suspended
- 7 from her job and was home, and she said to me,
- 8 I have a note on my partition wall that
- 9 explains how we are supposed to treat you.
- 10 She said they change the rules so often on
- 11 you, I can't keep it straight, and we are all
- 12 getting in trouble because we are not dealing
- 13 with you correctly. So I wrote a note to
- 14 myself how to deal with you.
- 15 I went there that day to see if I
- 16 could get a copy of that note, and I was
- 17 looking for Lynn Cameron to help me.
- 18 Q And so hang on for a second there.
- 19 Stepping back to your conversation
- 20 with Walley about the note, when did that
- 21 conversation take place?
- 22 A Right probably within days of me going to city
- 23 hall.

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- 1 and she was upset about Cheryl being removed,
- 2 gone, suspended, and so -- I believed she
- 3 would give me a copy of the letter.
- 4 Q When you came in to get a copy of the letter,
- 5 did you ask for a Right-To-Know request or did
- 6 you just go to the desk and ask?
- 7 A No, I just asked.
- 8 Q When you got to the assessing department, you
- 9 said Lynn was not there, who was there?
- 10 A Amanda Mazerolle.
- 11 Q Did you ask Ms. Mazerolle for a copy?
- 12 A Yes.
- 13 Q What did Amanda Mazerolle say to you?
- 14 A Go to legal.
- 15 Q Did you go to legal?
- 16 A Yes.
- 17 Q Who did you speak to?
- 18 A I think it was Manuela Perry, and I don't know
- 19 if that was a conversation that Celia Leonard
- 20 came out of her office. I just don't
- 21 remember. I was told -- you know what, it was
- 22 probably Celia Leonard, in that letter, she
- 23 had as her evidence, I think I know now,

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1 September of 2019, I wrote back to her, there
 2 might be a link there, but I can't quite get
 3 there.
 4 Q Let's take on the steps you took.
 5 You went to the assessing office
 6 looking for Lynn?
 7 A Yes.
 8 Q You spoke to Amanda Mazerolle who would not
 9 give you a copy --
 10 A She told me to go to legal.
 11 Q You went to legal, you spoke to Manuela?
 12 A Manuela and/or Celia Leonard and asked for a
 13 copy, and they said, no.
 14 Q But you are not sure exactly which one of
 15 those it was?
 16 A Exactly.
 17 Q And then after they said, no, where did you
 18 go?
 19 A I left.
 20 Q And legal is up on the third floor. By which
 21 door of the city hall did you leave?
 22 A The Elm Street door, the usual typical door, I
 23 came out the back door.

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1 letter, you know, that Cheryl Walley has up on
 2 her wall. I wanted to see if you would give
 3 me a copy, and can you tell me what Kleiner
 4 has told the clerks on how to deal with me,
 5 and she said, well, she gave us the option if
 6 we found you difficult, we didn't have to work
 7 with you, Louise Brown would handle you, and
 8 it was our choice, but then she sort of
 9 switched it up and said Louise Brown is going
 10 to handle her, no matter what.
 11 She said there were some rules
 12 changes, and I said, I don't think Cheryl
 13 Walley is coming back, and I would really love
 14 to see a copy of that note on her wall, on how
 15 to handle Laurie Ortolano.
 16 Q And what did Lynn say to that?
 17 A She didn't really respond. She had given me
 18 information on how I was to be handled, and it
 19 seems to me, it was later down the road, in
 20 terms and transcripts that that was going on.
 21 Q How long did that discussion take place?
 22 A Three minutes, short.
 23 Q Is there anything else you recall from the

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1 Q The one that goes out to the little parking
 2 lot?
 3 A Exactly.
 4 Q Had you parked there?
 5 A I parked in the last spot, not a lot of
 6 parking, on the left side. So when I am
 7 coming out, it is the far right side. I was
 8 in that spot.
 9 Q Close to the building, or close to the street?
 10 A Building. Pulled in facing the building.
 11 Q So you go back out that door, and you get in
 12 your car?
 13 A I go to get in my car, and Lynn Cameron is
 14 coming through the back way.
 15 Q In which direction?
 16 A Heading to city hall to go in the side door
 17 right behind Sy Mahfuz' building.
 18 Q What do you do then?
 19 A I approached her.
 20 Q What did you say to her?
 21 A I said, I am trying to figure out what rules
 22 Kim Kleiner has established for working with
 23 me. I was just downstairs trying to get a

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1 actual conversation itself about who said what
 2 to whom?
 3 A No, because I was asking questions to her, I
 4 really didn't. I don't know, and she answered
 5 them.
 6 Q And in addition to questions, you gave her
 7 statements, I really want to see that
 8 document, right?
 9 A I want to see that note.
 10 Q And what, if anything, did Lynn say in
 11 response to that statement?
 12 A I don't recall. I really believe at that
 13 point, they were all very frightened in the
 14 office, especially the clerks, because Cheryl
 15 was suspended now, and Lynn Cameron was good
 16 friends with her, go to her home, swim in her
 17 pool. I think Ms. Walley would babysit her
 18 kid, her granddaughter. They had an
 19 association, so I think her absence was
 20 impactful. That was my feeling.
 21 Q And this was during the investigation, the
 22 Nashua Police investigation into the assessing
 23 department, right?

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1 A Right, I believed it was into the work of Greg
 2 Turgiss and Kim Kleiner, but it seemed to
 3 expand into the assessing department. It took
 4 on a different dimension.
 5 Q In any case, the conversation that you had
 6 with Lynn Cameron outside city hall took place
 7 while this investigation was ongoing?
 8 A Yes.
 9 Q The investigation that you had triggered,
 10 right?
 11 A Yes.
 12 Q You don't have any reason to think it wasn't
 13 known that you triggered this investigation,
 14 right?
 15 A I think they all knew that.
 16 Q You would agree Cameron could have chosen at
 17 that time not to talk to you outside, right?
 18 A Yes.
 19 Q And if she had said to you, Ms. Ortolano, I
 20 would really rather not talk about this
 21 outside of city hall, you would have honored
 22 that, right?
 23 A Yes.

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1 Ms. Ortolano, I would rather not talk to you
 2 outside of city hall or outside the assessing
 3 office, you would have honored that, right?
 4 A I believe so, yes.
 5 Q Did you ever speak with Lynn Cameron about her
 6 discussions with Frank Lombardi about this
 7 incident?
 8 A No.
 9 Q Do you know if Cheryl Walley ever did?
 10 A I don't know. It is possible.
 11 Q But Cheryl hasn't come to you and said, hey, I
 12 just spoke to Lynn and here is what she said?
 13 A No.
 14 Q No one else has either, right?
 15 A No.
 16 Q The only information you have heard about Lynn
 17 Cameron's report of that incident comes from
 18 Frank Lombardi's interview of her?
 19 A Correct.
 20 Q Or his report?
 21 A What is written, and she was never a witness
 22 in any of my cases.
 23 Q And when you did eventually get a warning from

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1 Q And that really goes for anyone at the
 2 assessing department, right? If Louise Brown
 3 or anyone else had said to you face-to-face,
 4 Ms. Ortolano, I really only want to talk to
 5 you in city hall, in the department, I don't
 6 want to talk to you at Target or any other
 7 places, you would have honored that too,
 8 right?
 9 A That never happened. The only individual that
 10 seemed to trigger this was Lynn Brown behind
 11 Sy Mahfuz' business.
 12 Q Lynn Cameron?
 13 A I mean, Lynn Cameron behind Sy Mahfuz'
 14 business.
 15 It is funny you word it that way, at
 16 Target and stuff. I thought it was outside of
 17 city hall. When I got the warning, they said,
 18 you can't talk to any assessor outside of
 19 their office, the assessing office. I didn't
 20 even know that was the warning. I didn't
 21 realize that until I got it.
 22 Q My question was if any of the other members of
 23 the assessing department had asked you,

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1 Detective Lombardi, it ran to all persons in
 2 assessing except for Cheryl Walley, correct?
 3 A It wasn't presented to me that way at the time
 4 the warning was given to me, but when I
 5 received the written warning four months
 6 later, that is what was in there.
 7 Q And have you spoken to any of the members of
 8 the assessing department, the members at that
 9 time, have you spoken to them at any time
 10 since about that warning?
 11 A No, only Cheryl Walley, and she was never
 12 notified by the police. They didn't include
 13 her. She didn't get asked one way or another.
 14 So she was the only one I talked to. No one
 15 else. I never spoke to anyone about it.
 16 Q You don't have any evidence one way or the
 17 other as to whether the other assessing
 18 department members actually asked that they be
 19 lumped into this warning?
 20 A Correct.
 21 Q We went over this before, so I will just be
 22 brief, but to keep it in order, you learned
 23 that the police came to your house?

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1 A Yes.

2 Q And then after you learned that, you went to

3 the police station to meet with Detective

4 Lombardi?

5 A And the other officer.

6 Q And where did that meeting take place?

7 A Right in the lobby.

8 Q They didn't take you into the back area at

9 all?

10 A No.

11 Q And what specifically, I am guessing here,

12 Detective Lombardi did the talking?

13 A Correct.

14 Q The other officer didn't speak at all?

15 A He did.

16 Q Did he just introduce you, or did he say

17 anything else?

18 A He introduced, and then at the end, he made a

19 comment, because I said something that made

20 him laugh, and he said that is really funny.

21 Q What was it that made him laugh?

22 A Detective Lombardi said to me, do you have any

23 questions, and I said I have a shit ton of

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1 it wasn't him, it was going to be Fojo or

2 Lehmann or another counsel?

3 A He did accurately record, is this even legal?

4 What is going on here? I just couldn't

5 imagine -- for over a year, I called it a

6 restraining order, a warning for a restraining

7 order. That is how I referred to it all the

8 time.

9 There is no such thing I found out

10 later. There really isn't. That is what it

11 felt like to me. I couldn't tell what it was.

12 Q At some point, you discussed this warning with

13 maybe it's Deputy Chief Testeverde?

14 A Yes.

15 Q Was he deputy chief then?

16 A He was a deputy, yes.

17 Q And you and he talked about this warning that

18 Lombardi had given you, right?

19 A Yes, it was awhile after, too, I believe.

20 Q And you actually asked for a similar warning

21 was to be given to Ms. Kleiner, right?

22 A Yes.

23 Q And do you know if that warning was given to

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1 questions, but I think I have to talk to my

2 lawyer, and this younger police officer burst

3 out laughing, and he said, that is really

4 funny, to get written up that way, but that is

5 what happened.

6 Q That is what happened?

7 A Yes. God's honest truth.

8 Q And the lawyer you would have talked to, was

9 that Fojo, or were you on to Lehmann?

10 A I was transitioning. I probably talked to

11 Fojo and Lehmann. I know I talked to Lehmann,

12 because he followed up on the Right-To-Know

13 for me to get the report. I am sure Lehmann.

14 Q And maybe Fojo also?

15 A Maybe.

16 Q Because you did have a lot of questions?

17 A Oh, I did.

18 Q You had a shit ton of questions, didn't you,

19 right?

20 A I didn't expect what came my way, that is what

21 it really came down to. I didn't expect it.

22 Q Once you got that news from Lombardi, you were

23 going to ask those questions of somebody. If

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1 Ms. Kleiner?

2 A I believe he talked to her, but it wasn't like

3 my warning. It had a whole different feel.

4 Q You weren't there when he talked to her?

5 A He wrote something up, and he sent it to me, I

6 think. And it was so carefully danced around,

7 actually, kind of felt like -- yes, it was

8 interesting.

9 Q What exactly did Lombardi say to you when he

10 gave you the no contact warning?

11 A Okay. It is hard for me to be exact, but I

12 will give you the points that you remember.

13 Just that he had in the course of

14 doing his investigation been given information

15 that employees of the assessing office did not

16 want to have contact with me. I thought he

17 said outside of city hall, and he said, you

18 recently had a conversation with Lynn Cameron

19 that she wasn't comfortable with, and

20 speaking, he didn't say he didn't speak, but

21 he said in speaking with all the staff, none

22 of them want you to have contact with them

23 outside of city hall, and I was shocked, and I

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1 you own the property for ten years, and then
 2 you can get citizenship or residency or
 3 something like that?
 4 A It moved much quicker. You can get it in two
 5 or three years.
 6 Q Have you obtained yours now?
 7 A We have our residency visa right now. So we
 8 have to go through that two or three years,
 9 pass a language exam and a history exam to
 10 become a citizen. My Portuguese isn't what it
 11 needs to be yet.
 12 Q Is that the only thing holding you back now
 13 Portuguese language skills?
 14 A Yes, and my son who speaks seven languages is
 15 learning it now to teach his mother.
 16 (Whereupon, the court reporter
 17 marked Exhibit Number 8, Affidavit of
 18 Plaintiff to Inception Technologies, for
 19 Identification.)
 20 Q Exhibit 8 is an affidavit, Ms. Ortolano, from
 21 you that was filed in response to the
 22 Inception/Feoli motion to dismiss back in
 23 December of 2022.

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1 good grasp on the workings of the Nashua City
 2 Government."
 3 That statement was still true as of
 4 December of 2022 when you signed the
 5 affidavit, right?
 6 A When was it signed?
 7 Q The 5th of December 2022?
 8 A Yes, I stopped going in October of 2022, but I
 9 still could watch them on TV, yes.
 10 Q Why did you stop going in October of 2022?
 11 A Because there was an incident with an alderman
 12 who referred to me as giving off predatory
 13 vibes like crazy, and he was a social worker,
 14 a licensed social worker, and based on his
 15 background, he felt that I did oppositional
 16 research on children and I had predatory
 17 qualities, and I didn't want be -- I didn't
 18 want them bringing it up and over and over
 19 again.
 20 The board has a tendency to use
 21 their public comment at the end, their time to
 22 speak when the public can't speak to raise
 23 issues about me, and I felt that it would come

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1 A Yes.
 2 Q The last page has a /s/ electronic signature?
 3 A Yes.
 4 Q This is, in fact, your affidavit, correct?
 5 A Yes.
 6 Q Somewhere in the ether, there is an actual one
 7 signed by you?
 8 A I would assume so, but I just can't remember.
 9 Q In any event, this was something you reviewed
 10 and signed under the pains and penalties of
 11 perjury?
 12 A When you ask me that way, it looks like you
 13 found something.
 14 Q No, I am not actually trying to trick you. I
 15 am just trying to confirm it is your
 16 affidavit?
 17 A Yes, to the absolute best of my ability. I
 18 was absolutely trying to be truthful.
 19 Q In paragraph 3, you say, "By regularly
 20 attending public hearings and meetings
 21 conducted by the City of Nashua Government and
 22 keeping up with the bulk of pending issues
 23 affecting the citizens of Nashua, I have a

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1 up over and over again, so I removed myself
 2 from board meetings. From that time, really,
 3 forward until now, I have attended very few.
 4 Q That was Alderman Moran?
 5 A Yes.
 6 Q On paragraph 4, "In 2020, the City chose to
 7 undertake a project to outsource all property
 8 record files in order to create digitally
 9 scanned files."
 10 How did you first learn about that
 11 project?
 12 A I believe Ms. Kleiner went to the budget
 13 committee to get approval of a dollar amount
 14 that was in excess of 25 grand and required
 15 approval. I believe the first round of money
 16 was under 25 grand, but then she needed more.
 17 I can't recall the date exactly. It did
 18 require budget committee approval.
 19 Q And do you remember when it was that you first
 20 learned about that project?
 21 A It says, "In 2020, the City chose to undertake
 22 a project." It must have been -- like the
 23 month, I don't remember.